

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
<i>Plaintiff,</i>)	
)	Case No. 07 CR 777
v.)	
)	Honorable Amy St. Eve,
MILES HUNTER,)	<i>Judge Presiding</i>
<i>Defendant.</i>)	

**DEFENDANT MILES HUNTER'S SUPPLEMENTAL MOTION
FOR RECONSIDERATION OF RELEASE PENDING TRIAL**

Defendant Miles Hunter, pursuant to the provisions of 18 U.S.C. §3142(c), as well as the Due Process and Excessive Bail Clauses of the Fifth and Eighth Amendments to the Constitution of the United States, respectfully submits the following in support of his previously filed Motion for Reconsideration of Release Pending Trial.

1. On March 28, 2008, the defendant filed a Motion for Reconsideration of Release Pending Trial. The Court has taken the motion under advisement.

2. On Monday, July 14, 2008, the defendant experienced chest pains and shortness of breath and was admitted to Thorek Hospital the following day, where it was determined that he suffered a mild heart attack. The defendant remained at the hospital through July 17, 2008, when he was released back to the Metropolitan Correctional Center. He is presently taking daily medications prescribed by Thorek Hospital for his heart condition.

3. Should the Court allow the defendant to be released prior to trial, he would be able to obtain private health care and consult a specialist regarding his condition. The defendant's recent hospitalization is not the first episode of heart problems as the defendant was

taken to an emergency room following chest pains and shortness of breath on an occasion prior to his arrest in this case.

As the Court may recall, the defendant's wife is employed by the United States Postal Service, and the defendant has medical insurance through her employment. Should the defendant be released on bond, he would be able to obtain medical care through his insurance regarding his present heart condition.

4. Additionally, the defendant would comply with any of the conditions previously set forth in his motion including posting substantial property and his wife's retirement account which she accumulated over a twenty year period, a third-party custodian, regular appointments with a pretrial officer, home confinement and electronic monitoring, or any other condition set forth in 18 U.S.C. §3142(c)(1).

5. In light of the reasons set forth in his previous motion, as well as his present health concerns, the defendant respectfully requests the Court to allow his release pending trial.

Respectfully submitted,

/s/ Susan M. Pavlow
Attorney for defendant

SUSAN M. PAVLOW
Attorney for Defendant
53 West Jackson Boulevard, Suite 1460
Chicago, Illinois 60604
312-322-0094
Facsimile 312-362-9907

CERTIFICATE OF SERVICE

I hereby certify that Defendant's Supplemental Motion for Reconsideration of Release Pending Trial was served on July 22, 2008, in accordance with Fed.R.Crim.P.49, Fed.R.Civ.P.5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

/s/ Susan M. Pavlow
Attorney for defendant

